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Attorneys for Defendant
MARIO GONZALEZ

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO GONZALEZ,

Defendant.

CASE NO. 2:20-CR-00013 WBS

STIPULATION AND ORDER TO CONTINUE
JUDGMENT AND SENTENCING

DATE: June 30, 2025
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Defendant, Mario Gonzalez, by and through his counsel of record, and plaintiff, by and through
it's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for judgment and sentencing on June 30, 2025.
Mr. Gonzalez filed a motion to dismiss pursuant to *United States v. Duarte*, 101 F.4th 657)9th Cir.
(2024), setting the motion for hearing on the same date that was previously set for the judgement and
sentencing.

2. Additional time is now necessary before the parties are prepared to proceed to sentencing.
By this stipulation, the parties now move to continue the judgment and sentencing hearing until
August 11, 2025.

3. Defense counsel just finished a homicide trial in Sacramento County and requests
additional time to review current law and the Government's recently filed sentencing memorandum with
Mr. Gonzalez. He is housed in the Yuba jail which takes additional planning and time.

4. The parties understand that this date is available to the Court for a continued judgment

1 and sentencing hearing.

2 5. It is therefore requested that the motions hearing, and judgement and sentencing date
3 currently scheduled for June 30, 2025 be continued to **August 11, 2025 at 10:00 a.m.** before this Court.

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5 IT IS SO STIPULATED.

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8 Dated: June 23, 2025

MICHELE BECKWITH
United States Attorney

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10 /s/ JAMES CONOLLY

JAMES CONOLLY
Assistant United States Attorney

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14 Dated: June 23, 2025

/s/ TAMARA SOLOMAN

TAMARA SOLOMAN
Counsel for Defendant
MARIO GONZALEZ

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18 **ORDER**

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20 IT IS SO FOUND AND ORDERED.

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22 Dated: June 25, 2025



23 **WILLIAM B. SHUBB**
24 **UNITED STATES DISTRICT JUDGE**